

UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

In the Matter of the Search of)
 (Briefly describe the property to be searched)
 or identify the person by name and address)
)
 Information related to Discord accounts "ayeG#7086")
 and "est2007#6918")
)
 Case No. 1:21-MJ-365

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

Information related to Discord accounts "ayeG#7086" and "est2007#6918", stored at premises owned, maintained, controlled, or operated by Discord, Inc. See Attachment A.

located in the Northern District of California, there is now concealed (*identify the person or describe the property to be seized*):

Evidence of, instrumentalities used in committing, and fruits of the crimes of 18 U.S.C. § 2252A(a)(2)(A) and § 2252A(a)(5)(B). See attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 2252A(a)(5)(B)	Possession of Child Pornography
18 U.S.C. § 2252A(a)(2)(A)	Distribution of Child Pornography

The application is based on these facts:

- Continued on the attached sheet.
- Delayed notice of _____ days (*give exact ending date if more than 30 days*: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/S/ Emily R. Keller

Applicant's signature

Emily R. Keller, Special Agent, FBI

Printed name and title

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: 9/17/21


Joi Elizabeth Peake
 Judge's signature

City and state: Winston-Salem, North Carolina

Joi Elizabeth Peake, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Emily R. Keller, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am investigating offenses related to child sexual exploitation. This Affidavit is submitted in support of an application for a warrant to search information related to Discord accounts “ayeG#7086” and “est2007#6918” (“SUBJECT ACCOUNTS”). The information is stored at premises owned, maintained, controlled, or operated by Discord, Inc., a company headquartered in the Northern District of California. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2252A(a)(2)(A) and 2252A(a)(5)(B) to require Discord to disclose to the government records and other information in its possession, pertaining to the SUBJECT ACCOUNTS.

2. The statements in this Affidavit are based in part on information provided by other law enforcement officers and on my investigation of this matter. Since this Affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe

are necessary to establish probable cause to believe that contraband and evidence, fruits, and instrumentalities of violations of Title 18 U.S.C. §§ 2252A(a)(2)(A) and 2252A(a)(5)(B) are presently located in the SUBJECT ACCOUNTS.

AFFIANT BACKGROUND

3. I am a Special Agent of the Federal Bureau of Investigation (“FBI”), and have been since October of 2019. My initial training consisted of an eighteen-week FBI new agent course during which I received instruction on various aspects of federal investigations, ranging from economic espionage and child pornography, to kidnapping and computer intrusions. In addition, I have earned both a Bachelor of Arts in International Studies and a Master of Public and International Affairs.

4. I am currently assigned to the Charlotte Division and stationed at the Greensboro Resident Agency. As I am new to investigations involving child exploitation and child pornography, FBI Special Agent Tara S. Thomas, who has investigated child pornography cases for more than eight years, assisted me with drafting this Affidavit. Prior to becoming a Special Agent of the FBI, I worked as a Staff Operations Specialist, investigative analyst, for the FBI for over four years.

5. I have supported numerous FBI investigations through investigative research and analysis, to include investigations of cybercrime. I am familiar with, and have employed, investigative techniques used in these investigations, such as analysis of Internet Protocol addresses and Internet Service Provider records. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. § 2252A, and I am authorized by law to request a search warrant. As a Special Agent, I am authorized to investigate violations of laws and to execute warrants issued under the authority of the United States.

STATUTORY AUTHORITY

6. As noted above, this investigation concerns alleged violations of the following:

- a. 18 U.S.C. § 2252A(a)(2)(A) prohibits a person from knowingly receiving or distributing child pornography, as defined in 18 U.S.C. § 2256(8), using any means and facility of interstate and foreign commerce, that has been mailed, or that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer. Attempts and conspiracies are also violations of this statute.

b. 18 U.S.C. § 2252A(a)(5)(B) prohibits a person from knowingly possessing or knowingly accessing with intent to view any material that contains an image of child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer. Attempts and conspiracies are also violations of this statute.

DEFINITIONS

7. The following definitions apply to this Affidavit and Attachment B:

a. "Chat," as used herein, refers to any kind of text communication over the Internet that is transmitted in real-time from sender to receiver. Chat messages are generally short in order to enable other participants to respond quickly and in a format that resembles an oral conversation. This feature distinguishes chatting from other text-based online communications such as Internet forums and email.

- b. "Child erotica," as used herein, means materials or items that are sexually arousing to persons having a sexual interest in minors but that are not necessarily obscene or do not necessarily depict minors engaging in sexually explicit conduct.
- c. "Child pornography," as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.
- d. "Computer," as used herein, refers to "an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction

with such device” and includes smartphones, other mobile phones, and other mobile devices. *See* 18 U.S.C. § 1030(e)(1).

- e. “Hashtag,” as used herein, refers to a word or phrase preceded by a hash or pound sign (#), which is used to identify messages or groups on a specific topic.
- f. An “Internet Protocol address” or “IP address,” as used herein, refers to a unique numeric or alphanumeric string used by a computer or other digital device to access the Internet. Every computer or device accessing the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer or device may be directed properly from its source to its destination. Most Internet Service Providers (“ISPs”) control a range of IP addresses. IP addresses can be “dynamic,” meaning that the ISP assigns a different unique number to a computer or device every time it accesses the Internet. IP addresses might also be “static,” if an ISP assigns a user’s computer a particular IP address that is used each time the computer accesses the Internet. ISPs typically maintain logs of the subscribers to whom IP addresses are assigned on particular dates and times.

- g. The “Internet” is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.
- h. “Minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.
- i. “Mobile application” or “chat application,” as used herein, are small, specialized programs downloaded onto mobile devices, computers and other digital devices that enable users to perform a variety of functions, including engaging in online chat and sending or receiving images and videos.
- j. “Records,” “documents,” and “materials,” as used herein, include all information recorded in any form, visual or aural, and by any means, whether in handmade, photographic, mechanical, electrical, electronic, or magnetic form.
- k. “Remote computing service”, as defined in 18 U.S.C. § 2711(2), is the provision to the public of computer storage or processing services by means of an electronic communications system.

- l. "Sexually explicit conduct," as defined in 18 U.S.C. § 2256(2), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the anus, genitals, or pubic area of any person.
- m. "Visual depiction," as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.
- n. A "Virtual Private Network" or "VPN," as used herein, refers to the opportunity to establish a protected network connection when using public networks.

BACKGROUND ON DISCORD ACCOUNTS & SERVICES

8. Discord is located at 444 De Haro Street, Suite 200, San Francisco, California 94107. Based on my training and experience, I know that Discord provides free hosting for registered users to set up, configure,

and customize their own communication servers, as well as user text chat rooms. Discord is a web-based service which can be accessed via web browser or by installing an application for a Windows, iOS, or Android device.

9. Users register for the service with an email address, username, and password; after registering users have access to all of Discord's features, including voice calls and chat rooms. Discord is an instant messaging service that provides both text and voice communication. Discord conversation logs are saved to a "Chats" area in the user's Discord account. Discord account users can link other social media and entertainment services to their Discord account and can automatically integrate features of those applications such as Google+. Discord stores identifying information (such as the email address used to register an account and a history of IP addresses), and usage information (such as chat logs, login sessions, and device information). Discord also collects information from any third-party application linked to a user's profile. The user account for a Discord account is alphanumeric username, which is then combined with a pound symbol (#) as well as a string of 4 or 5 randomized numbers, producing a unique "tag." The tag is publicly visible on an account's profile and can be used for a variety of networking purposes inside of Discord, such as friend lists, server whitelists,

and blocking other users. The user ID number is a unique 17 or 18-digit number used to identify an account within Discord's audit logs.

PROBABLE CAUSE

Discord CyberTipline Report 87736993

10. On March 17, 2021, Discord submitted CyberTipline Report (“CT”) 87736993 to the National Center for Missing and Exploited Children (“NCMEC”). The report identifies one video, depicting child pornography, being uploaded to a Discord account utilizing email address agriggs112392@gmail.com, username “ayeG#7086,” and user ID number 723996637281779733, on March 17, 2021 at 00:56 UTC. Below is a brief description of the referenced file, based on my review:

- a. A video entitled "video0.mp4" is an mp4 lasting approximately one minute and 35 seconds and depicts a prepubescent female minor, about the age of five, lying on a mattress with a pink floral pattern, wearing a red Disney t-shirt and khaki shorts, with a colorful pattern, and a green wrist band on her right wrist. There are several articles of clothing scattered on the mattress and a small wooden table next to the mattress with silver metal legs. The minor is holding an erect adult penis with her right hand. The minor sits up and rubs the adult penis.

The minor then touches the adult penis with her right index finger. She sits back on the mattress next to a prepubescent male minor, about the age of five, who is sitting on the mattress and wearing a blue t-shirt. The female minor lifts her right leg and touches the adult penis with her right foot. The male adult is wearing jeans that are unzipped to expose his penis and black shoes. The female minor then uses both her hands to rub the adult penis. She is wearing a black and white bracelet on her left wrist. The female minor rubs the adult penis with her left hand. The male adult ejaculates on the floor and the female minor stands up and walks away.

11. On April 20, 2021, an administrative subpoena was served on Discord, Inc. requesting subscriber information for the Discord account associated with email address agriggs112392@gmail.com, username “ayeG#7086,” and user ID number 723996637281779733. As a result of the subpoena, Discord provided the following account information:

Username:	Deleted user 9e85fd61#7086
Registration Time:	2020-06-20 20:24 UTC

12. According to Discord, IP address 68.71.244.206 was identified 10 times, between March 16, 2021 23:28 UTC and March 17, 2021 1:00 UTC, within the account. IP address 31.171.153.164 was identified two times, on

March 16, 2021 between 18:16 and 18:16 UTC, within the account. A query of the American Registry for Internet Numbers (“ARIN”) online database revealed IP address 68.71.244.206 as being registered in Toronto, Canada to Total Servicer Solutions, LLC, a Virtual Private Network (“VPN”) server. A query of the ARIN online database revealed IP address 31.171.153.164 as being registered in Durres, Albania to Keminet SHPK, a VPN server. Based on my training and experience, VPN servers are utilized to encrypt the user’s internet traffic and disguise the user’s online identity.

13. Since the IP addresses related to the Discord account are hosted by foreign VPN servers, an administrative subpoena was served on Google requesting subscriber information for email address agriggs112392@gmail.com (the email address associated with the Discord account), on April 20, 2021. As a result of the subpoena, Google provided the following account information:

Google Account ID:	159733955340
Name:	Alex Griggs
Created on:	2013-11-08 18:30 UTC
Terms of Service IP:	70.193.9.144
Recovery email:	sidelinestory77@yahoo.com
Recovery SMS:	(336) 823-0005

14. According to Google, 379 unique IP addresses were identified, between October 1, 2020 at 1:03 UTC and April 19, 2021 at 20:10 UTC, within the account. A query of the ARIN online database for a sampling of these IP addresses, including 2603:6081:8305:a495:c4d0:5ac2:879b:9038, utilized on April 19, 2021 at 20:10 UTC, 104.138.196.199, utilized on March 17, 2021 at 3:25 UTC (approximately 3 hours after the image, containing child pornography, was uploaded to the Discord account associated with email address agriggs112392@gmail.com), and 2603:6081:8305:a495:e15e:46a8:3b70:2ee1, utilized on February 14, 2021 at 14:09 UTC, revealed all three IP addresses as being registered to Charter Communications, Inc.

15. On June 10, 2021, an administrative subpoena was served on Charter Communications, Inc. requesting subscriber information for IP addresses 2603:6081:8305:a495:e15e:46a8:3b70:2ee1 on February 14, 2021 at 14:09 UTC, 104.138.196.199 on March 17, 2021 at 3:25 UTC, and 2603:6081:8305:a495:c4d0:5ac2:879b:9038 on April 19, 2021 at 20:10 UTC. As a result of the subpoena, Charter Communications, Inc. provided the following information:

Subscriber Name: Alexander Griggs

Service/Billing Address:	3411 Old Vineyard Road, Apartment I3, Winston-Salem, North Carolina 27103
Username or Features:	agriggs112392@gmail.com
Phone Number:	(336) 823-0005

16. A query performed on the subscriber identifiers, including email address agriggs112392@gmail.com, Discord username “ayeG#7086,” Discord user ID number 723996637281779733, Alex Griggs, telephone number (336) 823-0005, and address 3411 Old Vineyard Road, Apartment I3, Winston-Salem, North Carolina 27103, in NCMEC’s database yielded the following additional related CTs:

Discord CyberTipline Report 87769363

17. NCMEC provided Discord CT 87769363, since the suspect account is associated with email address agriggs112392@gmail.com, Discord username “ayeG#7086,” and Discord user ID number 723996637281779733; the same account identifiers referenced in Discord CT 87736993. On March 17, 2021, Discord submitted CT 87769363 to NCMEC. The report identifies two videos, depicting child pornography, being uploaded to a Discord account associated with email address agriggs112392@gmail.com, Discord username “ayeG#7086,” and Discord user ID number 723996637281779733, on March 16, 2021 at 23:38 UTC, by IP address 68.71.244.206; the same IP address

identified from Discord CT 87736993. Below is a description of one of the referenced files, based on my review:

- a. A photograph entitled “image1” is a JPEG file depicting a prepubescent female minor, about the age of 10, who is sitting on a green and beige couch. The minor is wearing a long sleeve pink shirt and no underwear. The minor is holding her right foot up with her right hand to expose her genitals.

Discord CyberTipline Report 87722642

18. NCMEC provided Discord CT 87722642, since the suspect account is associated with telephone number (336) 823-0005, which is the same telephone number associated with email address agriggs112392@gmail.com; the email address associated with the suspect account in Discord CT 87736993. On March 16, 2021, Discord submitted CT 87722642 to NCMEC. The report identifies one video, depicting child pornography, being uploaded to a Discord account utilizing email address agriggsncroffing@gmail.com, username “est2007#6918,” user ID number 818177150653956098, and telephone number (336) 823-0005 (verified as an active telephone number by Discord), on March 16, 2021 at 1:41 UTC, by IP address 31.171.155.86. A query of the ARIN online database revealed IP

address 31.171.155.86 as being registered in Durres, Albania to Keminet SHPK, a VPN server. Below is a description of the referenced file, based on my review:

- a. A video entitled “image0” is a GIF lasting approximately six seconds and continually repeats. The video depicts a prepubescent female minor, about the age of five, lying on her back on purple towel on a quilt on a bed. The minor is not wearing any clothing. The minor’s wrists are tied above her head with yellow rope and her legs are spread apart. She has yellow rope around both of her ankles. The minor’s eyes are covered with fabric that is pink, white, and blue. A brown canine, wearing a red collar, is licking the minor’s genitals. I deem this video to be Bondage, Discipline, Sadism, and Masochism (BDSM).

Kik CyberTipline Report 96935381

19. NCMEC provided Kik CT 96935381, since the suspect account is associated with email address agriggsncroffing@gmail.com. On July 31, 2021, Kik submitted CT 96935381 to NCMEC, based on a Kik account utilizing email address agriggsncroffing@gmail.com, username “queenofthekingz,” and user ID “queenofthekingz_782.” The user of the specified Kik account uploaded 29 files, containing child pornography, between June 10, 2021 at

20:24 UTC and June 24, 2021 at 19:44 UTC, from 11 unique IP addresses. According to the ARIN online database, all of these IP addresses resolve to VPN servers. Below is a brief description of four of the referenced files, based on my review:

- a. A video entitled "2130ca88-d7c0-4c61-bb99-015f4b9c2786" is an mp4 lasting approximately one minute and two seconds and depicts a prepubescent female minor, about the age of three, who is not wearing clothing. A male adult is lying on a bed and is not wearing any clothing. They are in a room with white walls. The adult is wearing dark socks. The minor is holding the adult's erect penis with her right hand. The adult's penis is inserted in the female minor's mouth. The minor moves her mouth up and down the adult's penis. After the adult ejaculates in the minor's mouth, the minor rubs the adult's penis with both of her hands, then waves to the camera. I deem this video to be BDSM.
- b. A video entitled "43266b59-9a91-48f8-8a81-354381b7dbc4" is an mp4 lasting approximately 46 seconds and depicts a prepubescent female minor, about the age of four, wearing a white shirt and no underwear. The minor is lying on the stomach of a male adult. The adult is penetrating the minor's anus with his penis. The adult uses his hands

to hold the minor's abdomen as he continues to penetrate the minor's anus. I deem this video to be BDSM.

- c. A video entitled "61d97e65-f142-45cf-a700-8195d7ed860d" is an mp4 lasting approximately one minute and 30 seconds and depicts a prepubescent female minor, about the age of three, lying on her back on a bed with beige sheets. The minor is not wearing any clothing. A female adult, wearing hoop earrings, spreads the minor's legs apart to expose her genitals. The female penetrates the minor's vagina with her tongue. The adult moves her tongue back and forth on the child's genitals. The adult uses her right hand to rub the minor's genitals. She then moves the minor's body closer to the camera and continues penetrating the minor's vagina with her tongue. The adult uses both her hands to spread the minor's vagina. I deem this video to be BDSM.
- d. A video entitled "9568e716-f378-4666-9b1b-c8fcc712bd94" is an mp4 lasting approximately 44 seconds and depicts a prepubescent female minor, about the age of five, lying on her abdomen on a bed with white sheets. The minor is not wearing any clothing and her eyes are covered with white fabric. The minor's face is positioned near the genitals of a male adult, who is lying on the bed on his back and not wearing any

clothing. This adult appears to be wearing a white surgical mask over his nose and mouth. The adult's erect penis rubs the minor's face and penetrates her mouth. A second male adult is kneeling on the bed behind the minor, wearing a black shirt and no underwear, he is penetrating the minor's anus with his erect penis. The adult, who is lying on his back, holds the minor's head with his right hand and moves her back and forth as the adult, who is kneeling behind her, continues to penetrate her anus with his erect penis. The minor does not exhibit regular movements during this interaction as if in a drugged state. I deem this video to be BDSM.

Surveillance and Database Checks

20. On September 3, 2021, surveillance observed the residence located at 3411 Old Vineyard Road, Apartment I3, Winston-Salem, North Carolina 27103 (“SUBJECT PREMISES”). The residence is an apartment located in unit I3, in building I, of the Arlington Apartments. The building is brick and has black shutters. Address number “3411” is displayed on the entrance sign to the Arlington Apartments. The building has the letter “I” prominently displayed to the right of the entrance walkway. The SUBJECT PREMISES is a first-floor apartment. The letter and number “I3” are

displayed on the front door to the apartment. The property is listed in Forsyth County Tax Department as deed book 3,523, page 1,844, parcel number 6814-19-8913.00.

21. A check of publicly available databases show Alexander Ray GRIGGS (“SUBJECT PERSON”), date of birth November 23, 1992, as living at the SUBJECT PREMISES.

22. On September 8, 2021, surveillance identified Alexander Ray GRIGGS, from his North Carolina Department of Motor Vehicles (“NCDMV”) picture, exit the SUBJECT PREMISES with a female minor, under 12 years of age, enter a Volkswagen, Virginia tag UHZ3590, and exit the apartment premises.

23. A check of publicly available databases identified Parent-1, date of birth April of 1994, and M.G., date of birth November of 1937, as possible relatives of Alexander Ray GRIGGS. A Facebook profile belonging to M.G. was identified. The profile picture on her unique Facebook profile, posted on or around January 11, 2016, depicts an elderly woman, presumably M.G., with Alexander Ray GRIGGS, identified from his NCDMV picture, Parent-1, and a prepubescent female minor, about the age of three. Several of Parent-1’s Facebook photos from her unique Facebook profile appear to depict the

same female minor. An Accurint search for Parent-1 revealed that she shared a specified address in Greensboro, North Carolina, with Alexander Ray GRIGGS, between 2016 and 2019. The female minor depicted in the referenced image appears to be Parent-1's daughter. According to a Facebook post on Parent-1's account, her daughter likely has a familial relationship with Alexander Ray GRIGGS.

24. On September 9, 2021, I executed a search warrant on Alexander Ray GRIGGS and the SUBJECT PREMISES. Alexander Ray GRIGGS and Minor-1 were alone at the SUBJECT PREMISES. I confirmed that Alexander Ray GRIGGS resides at the SUBJECT PREMISES. During an interview, Alexander Ray GRIGGS confirmed that his telephone number is (336) 823-0005. Later in the interview, he requested an attorney and the interview was terminated.

25. Based on the foregoing identification of IP addresses 2603:6081:8305:a495:e15e:46a8:3b70:2ee1, 104.138.196.199, and 2603:6081:8305:a495:c4d0:5ac2:879b:9038, identification of the SUBJECT PERSON's Discord and Kik accounts, identification of shared child pornography known to me, and the facts listed above, there is probable cause to believe that there is evidence of a continual pattern of on-going possession

of child porongraphy, in violation of Title 18 U.S.C. § 2252A(a)(5)(B), and distribution of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A), through Discord, located in the SUBJECT ACCOUNTS.

INFORMATION TO BE SEIZED

26. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Discord to disclose to the government copies of the records and other information (including the content of communications) particularly described in Attachment A. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

27. Because the warrant will be served on Discord who will then compile the requested records at a time convenient to Discord, reasonable cause exists to support execution of the requested warrant at any time day or night.

CONCLUSION

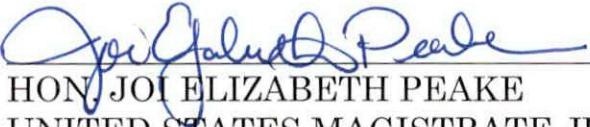
28. Based on the forgoing, I request that the Court issue the proposed search warrant. This Court has jurisdiction to issue the requested

warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711, 18 U.S.C. §§ 2703(a), (b)(I)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States ... that - has jurisdiction over the offense being investigated." Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

Respectfully submitted,

/s/ Emily R. Keller
Emily R. Keller
Special Agent
Federal Bureau of Investigation

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means (telephone), was placed under oath, and attested to the contents of the written affidavit.



HON. JO ELIZABETH PEAKE
UNITED STATES MAGISTRATE JUDGE
MIDDLE DISTRICT OF NORTH CAROLINA

9/17/21

ATTACHMENT A

Property to Be Searched

This warrant applies to records and other information related to the Discord accounts “ayeG#7086” and “est2007#6918,” which is stored at any premises owned, maintained, controlled, or operated by Discord, Inc., a company headquartered in the Northern District of California.

ATTACHMENT B

Particular Things to be Seized

I. Information to be Disclosed by Discord, Inc.

To the extent that the information described in Attachment A is within the possession, custody, or control of Discord, Inc., including any information that has been deleted but is still available to Discord, Inc., or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord, Inc., is required to disclose the following information to the government for each account listed in Attachment A:

- a. All information concerning messages sent or received by the account, including but not limited to, transactional chat logs, chat platform logs, files sent or received, and substance if available;
- b. Logs of users blocked by the account or the users who have blocked the account;
- c. Abuse reports from or concerning the account;
- d. Discord groups that the account belongs to;
- e. IP address logs, including registration IP;
- f. Location information;

- g. All business records and subscriber information, in any form kept, pertaining to the individual account, including subscribers' registration details, full names, addresses, ESN (Electronic Serial Number) or other unique identifier for the device(s) associated with the account, date of birth, telephone numbers, password records, and other identifiers or records associated with the account; and
- h. Any and all communications between Discord, Inc. and the account.

II. Information to be Seized by the Government

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of 18 U.S.C. §§ 2252A(a)(5)(B) and (a)(2)(A) by the user(s) of the account identified on Attachment A, in the form of the following:

- a. Records and information constituting child pornography, as defined in 18 U.S.C. 2256(8);
- b. Records and information constituting child erotica;
- c. Records and information revealing access to and/or trafficking of child pornography and identity of those participating, to include information about specific transactions and instances of access;

- d. Records and information revealing the sexual exploitation of or sexual interest in any minor;
- e. Records and information constituting or revealing the identity and age of any minor victim;
- f. Transactional and location information pertaining to any items authorized to be seized under this section (Section II), including log files revealing information such as time, date, and IP address used;
- g. Records and information constituting or revealing participation in groups or communication with others that provide or make accessible child pornography; and
- h. Records revealing or indicating who created and accessed the Discord account identified in Attachment A, including records revealing subscriber information, IP addresses, mobile devices used, and images depicting individuals who may be the user and/or his/her associates.

As used above, the terms "records" and "information" includes all forms of creation or storage, including any form of computer or electronic storage (such as hard disks or other media that can store data).